

SCROLL DOWN

#### **8. SOURCE REDUCTION.**

Document all of the source reduction practices at the installation and strategies for further waste reduction. Also describe any occurring or planned procurement efforts or programs. Source reduction may include procurement programs, innovative buying policies, pollution prevention, material reuse, donation, process alterations, and management practices that minimize waste generation.

#### **WHY SOURCE REDUCTION?**

*In the Pollution Prevention Act of 1990, EPA designated source reduction as the highest priority for effectively managing the solid waste stream. Benefits are derived from reducing solid waste in the form of natural resource conservation, reduction in treatment/disposal costs, and removal of risks and liabilities associated with disposal. Source reduction differs from recycling in that it focuses on reducing the waste stream at the source, to include procurement policies (environmentally preferable purchasing) and the way products are used (and reused). Source reduction, according to the EPA definition, also includes the reuse of materials with little or no "processing" involved. Planning and implementing source reduction measures play a vital role in meeting waste reduction goals.*

a. Purchasing Programs. Provide examples of the installation's current and planned buying practices that will accomplish source reduction and/or improve recycling markets.

(1) Environmentally Preferable Purchasing (EPP). This may include:

(a) Procuring materials with less packaging (see box).

(b) Purchasing materials that are recyclable.

(c) Purchasing items that are reusable.

### ENVIRONMENTALLY PREFERABLE PURCHASING

*EPP, according to EO 13101, is buying "products or services that have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose." All installation activities involved in purchasing, including government credit card holders, should be made aware of and expected to follow the environmentally preferable buying practices. References such as the GSA Environmental Products Guide and the DLA catalog of environmental products should be used to make purchasing decisions. Affirmative Procurement, or buying materials with recycled content, is just one aspect of a purchasing program. Others include purchasing materials that produce less waste and materials that are themselves easily recyclable. It's a good idea to develop a program to educate the consumers on the installation to buy "environmentally friendly" products.*

### WHAT ABOUT THE FARs?

*The Federal Acquisition Regulations, or FARs, were amended in 1997 to incorporate the Affirmative Procurement requirements of RCRA Section 6002 and EO 12873. FAR Part 23 sets policy regarding recovered material certification, estimation of recycled content, and waste reduction; FAR Part 4 requires paper documents to be printed/copied double-sided on recycled paper.*

(2) Affirmative Procurement. Under Section 6002 of RCRA, Federal agencies using appropriated funds to purchase certain items are to establish procurement programs to allow the use of recovered materials to the maximum extent possible (see box). Designated items include paper and paper products, cement and concrete, carpet, floor tiles, fiberboard, plastic desktop accessories, binders, toner cartridges, trash bags, hydraulic mulch, printer ribbons, plastic envelopes, and pallets. A complete list of the designated items is shown in the Appendix. Although an Affirmative Procurement program may not actually reduce amounts of wastes generated, it is considered a key component of integrated solid waste management. Buying products with recycled content "completes the circle," stimulating the market for recycled materials, conserving natural resources, and saving energy otherwise used to make products from virgin materials.

### **REDUCED PACKAGING - A GOOD PLACE TO START**

*It is estimated that over one-third of the solid waste stream consists of packaging materials, including various types of cardboard, paper, plastics, and styrofoam. Therefore, reducing or eliminating this waste component will significantly reduce the wastes generated. Purchasing items with reduced packaging (or reusing the packing materials) is an effective means of reducing this waste. The installation should reduce packaging waste by evaluating purchases according to the following packaging preferences:*

- ✓ *Products sold in bulk, with little or no packaging*
- ✓ *Minimal packaging or use of lightweight packing materials*
- ✓ *Returnable packaging (returned to manufacturer)*
- ✓ *Reusable or refillable packaging*
- ✓ *Recyclable, homogenous packaging (as opposed to layers of several materials)*
- ✓ *Packaging made with recycled content materials*

## AFFIRMATIVE PROCUREMENT

*Executive Order 13101 - Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition states that “agencies shall comply with executive branch policies for the acquisition and use of environmentally preferable products and services and implement cost-effective procurement preference programs favoring the purchase of these products and services.” EPA was required to designate products that are or can be made with recovered materials, and to recommend practices for buying these products. To meet this requirement, EPA published Comprehensive Procurement Guidelines (CPGs) to designate products and specify recycled content recommendations. EPA also issues guidance on buying recycled content products in the Recovered Materials Advisory Notices (RMANs).*

*The first CPG contained procurement guidelines for 24 products. It was published with the associated RMAN in the Federal Register on 1 May 1995 with an effective date of 1 May 1996. The second CPG and RMAN (CPG II and RMAN II) were published in the Federal Register on 13 November 1997. CPG II provided purchasing requirements for another 12 items that became effective on 13 November 1998. CPG III, published in August 1998, proposed the designation of 19 more items. A list of all of the designated and proposed items is provided as the Appendix and should be included in the ISWMP.*

*The DOD is responsible for developing and implementing an affirmative procurement program. In doing so, DOD must ensure that the purchasing guidelines are followed for the designated items and develop a system for tracking and reporting affirmative procurement efforts. The EO requires that “responsibilities for preparation, implementation, and monitoring of affirmative procurement programs are shared between the program personnel and acquisition and procurement personnel.” It is therefore the responsibilities of both procuring parties and generators (users) to follow the CPGs, associated RMANs, and overall intent of the Executive Order. The effectiveness of the program relies heavily on participation at the installation level in following those EPA guidelines. Detailed guidance is available in the CPGs and RMANs. Other guidance is available in a USEPA publication titled “Greening the Government, A Guide to Implementing Executive Order 13101.”*

b. Pollution Prevention. Reference the installation's pollution prevention plan, and briefly list the ways that material substitutions, process changes, or other methods are used to reduce the toxicity or quantity of wastes generated.

### **POLLUTION PREVENTION**

*The Pollution Prevention Act of 1990 established P2 as a national objective in reducing wastes at the source. This is achieved by lessening the toxicity and/or the quantity of the waste generated, through such tools as material substitution, use of raw materials, procurement policies, or process changes. Most of the P2 measures taken will effectively reduce the generation of solid waste. In some cases, however, reducing the use of hazardous constituents in a process results in the creation of more non-hazardous solid waste. This is an acceptable trade-off. The installation should maintain a separate P2 plan (possibly as part of the Hazardous Waste Management Plan) in accordance with Army requirements.*

c. Reuse. Identify areas where materials may be reused rather than discarded. Include plans for creating a waste exchange within the installation where activities can transfer usable items to other activities. Examples include the reuse of packaging material, to include styrofoam peanuts, bubble wrap, and cardboard boxes in good condition.

d. Management Practices. Identify everyday management practices used (or planned) that reduce wastes. Describe how personnel are informed of these practices. Examples are shown in the box below.

### **ADMINISTRATIVE WASTE REDUCTION PRACTICES**

- ✓ Eliminate stockpiling materials; order only what will be used
- ✓ Using e-mail in place of written memos whenever possible
- ✓ Saving e-mail messages to files rather than printing out
- ✓ Sending mail in reusable "shotgun" envelopes
- ✓ Reusing file folders (put stick-on labels over previous folder labels)
- ✓ Using routing slips in place of multiple copies
- ✓ Using old documents for scratch paper
- ✓ Using word processing features to condense pages, using less paper
- ✓ Using "print view" features to reduce printing mistakes and paper waste
- ✓ Returning toner cartridges for remanufacturing
- ✓ Making double-sided copies
- ✓ Providing proper maintenance for copiers and printers
- ✓ Saving binders for reuse
- ✓ Using reusable materials rather than disposable materials (i.e., coffee mugs instead of styrofoam cups)